

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

U.S. ASIA GLOBAL, INC.

Plaintiff,

vs.

Case No. 1:20-cv-05783

GLOBALGEEKS, INC.

Defendants.

**REPLY AND AFFIDAVIT
IN RESPONSE TO GLOBALGEEKS' LETTER OF MARCH 21, 2020 D.E. 21**

COMES NOW, Plaintiff, U.S. Asia Global, Inc. ("USAG") and in reply to Defendant GlobalGeeks, Inc. ("GlobalGeeks") Letter of March 21, 2020 (D.E. 21) submits the following:

1. Despite the evidence in the record and multiple conversations held between the Parties and Counsel of Record, it appears from the Letter filed by GlobalGeeks on March 21, 2020 that GlobalGeeks remains confused as to the legal ownership of the 476,000 masks being held by GlobalGeeks in its Moorestown, New Jersey warehouse.

2. There is no dispute that USAG purchased, imported, delivered, and owns the 476,000 masks.

3. USAG has already offered to indemnify GlobalGeeks against any and all claims of ownership by any third parties as evidenced by the Joint Stipulation filed as D.E. 22.

4. Attached please find the Affidavit of Simon Nussencweig, Managing Member of SZN, LLC who confirms under penalty of perjury that:


a. SZN is neither a parent, subsidiary nor affiliate of USAG;

- b. USAG owns the 476,000 masks being held by Global Geeks in its warehouse;
and
- c. SZN has no ownership or claim of ownership over USAG's 476,000 masks
being held by Global Geeks in its warehouse.

DATED: May 22, 2020.

Respectfully submitted,

GLANKLER BROWN, PLLC

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AHMAD ZAFFARESE, LLC

By: /s/ Aleena Sorathia
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Defendants.

DECLARATION OF SIMON NUSSENCEWEIG

Pursuant to 18 U.S.C. § 1746, I hereby declare as follows:

1. I am the Managing Member of SZN, LLC ("SZN") a New York Limited Liability company who serves as an import and wholesale broker for various products and materials.
2. In the course of its business activity, SZN has coordinated with an import company named US Asia Global ("USAG") to deliver product to third-party end buyers.
3. SZN is neither a parent, subsidiary nor affiliate of USAG.
4. USAG is likewise neither a parent, subsidiary nor affiliate of SZN.
5. No Member of SZN has any relationship with any Officer of USAG.
6. Under the agreement between SZN and USAG, USAG procures, imports, and/or delivers all products directly to the third-party end buyers.
7. Under the agreement between SZN and USAG, USAG retains full title to, and ownership over, all products it procures, imports, and/or delivers until USAG receives payment in full for the product.

8. SZN has been made aware that USAG has filed a lawsuit against Global Geeks, Inc. related to a May 4 and 5 delivery by USAG to Global Geeks of 476,000 masks.

9. Global Geeks has refused payment for these masks.

10. Global Geeks has repudiated its order for these masks.

11. SZN understands that Global Geeks is holding USAG's masks seeking resolution of a unrelated transaction between SZN, Bargain Me Online, and Global Geeks.

12. USAG had no involvement in the SZN, Bargain Me Online, Global Geek transaction.

13. USAG owns the 476,000 masks being held by Global Geeks in its warehouse.

14. SZN has no ownership or claim of ownership of USAG's 476,000 masks being held by Global Geeks in its warehouse.

I declare under the penalty of perjury that the above Declaration is true and correct.

DATED: May 22, 2020.



SIMON NUSSENCWEIG

CERTIFICATE OF SERVICE

I hereby certify that on this date, I filed the foregoing Submission on the Court's ECF Site. The submission is available for viewing and downloading on the Court's ECF system.

AHMAD ZAFFARESE, LLC

By: /s/ Aleena Sorathia

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Attorneys for Plaintiff, U.S. Asia Global, Inc.

Dated: May 22, 2020